

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brandon K. Jaycox (hereafter referred to as "Affiant"), being duly sworn, depose and state the following:

**INTRODUCTION**

1. Affiant is a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice and, as such, is an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516, Title 18, United States Code.

2. Affiant has been a Special Agent of the FBI since January 2016. Affiant is currently assigned to the San Juan Field Office. Affiant has investigated a number of violations of federal statutes, including, but not limited to, bank robbery, fugitives, white collar crime, gang and drug related crimes, and crimes on Indian land. Affiant is currently assigned to work Drug Criminal Enterprise investigations. Affiant has received training in narcotics investigations from the FBI and the Drug Enforcement Administration (DEA).

3. During the Affiant's career as a law enforcement officer, Affiant has become familiar with and has participated in the normal methods of investigation, including, but not limited to, use of physical surveillance, witness interviews, search warrants, arrest warrants, informants, pen registers, undercover officers, electronic devices, and searching of abandoned property. Your Affiant has participated in conducting physical surveillance, surveillance of undercover transactions, the introduction of undercover agents, the execution of search warrants, debriefings

of informants and reviews of recorded conversations and drug records. Through my training, education and experience, Affiant has become familiar with the manner in which illegal drugs are transported, stored, and distributed and the methods of payment for such drugs. Your Affiant has interviewed numerous defendants involved in the use, manufacture, transportation, and illegal sale of controlled dangerous substances. During the course of these interviews, Your Affiant has inquired and learned how individuals involved in drug distribution schemes and networks use and disperse the illegal proceeds generated due to the illegal sale of controlled dangerous substances, including, but not limited to, chemicals commonly utilized in the illegal manufacturing of methamphetamine. During the course of my training and interviews with various defendants, Your Affiant has learned how individuals involved in drug distribution schemes maintain records and conspire to deceive law enforcement, as well as rival distributors of controlled dangerous substances. Your Affiant has learned how individuals that are involved in the distribution of controlled dangerous substances maintain records and secret monies gained as a result of participation in illegal drug distribution networks. Affiant has conducted investigations of unlawful drug distribution, in violation of Title 21, United States Code, Sections 841, 843, 846, 848 & 856.

4. Affiant is currently participating in an investigation of a criminal organization which distributes narcotics throughout the Caribbean, the continental United States and Puerto Rico. This criminal organization operates out of the Dominican Republic. Information included in this Affidavit has also led Affiant to believe individuals in the organization are involved in money laundering. The information contained in this affidavit is known personally or was learned from other Officers or Agents and by reviewing reports and documents. This investigation is being

conducted jointly with Special Agents of the FBI, Homeland Security Investigations and the Drug Enforcement Agency (DEA).

**BACKGROUND OF INVESTIGATION**

Affiant has identified a Transnational Drug Organization (TCO) operating out of Dominican Republic. CESAR EMILIO PERALTA ADAMEZ aka EL ABUSADOR is the leader of this transnational criminal organization (TCO) based in the Dominican Republic which receives multi-kilogram shipments of cocaine from Colombia, Dominica Republic, and Venezuela, which is then subsequently sent by PERALTA'S TCO to Puerto Rico and the continental United States. In addition, PERALTA and his associates coordinate large-scale money laundering operations and as a result, illicit proceeds from narcotics sales are returned to the Dominican Republic and Colombia.

PERALTA has been in the drug trafficking business since approximately 1997 and his TCO earns millions of dollars from narcotics trafficking; some of that money has been used to bribe corrupt Dominican Republic National Police and government officials to avoid arrest, prosecution, and narcotics seizures.

**MEMBERS OF THE PERALTA TCO**

Over the course of the investigation, Affiant has identified the following persons as key members of PERALTA'S TCO:

Bernardo Antonio VALDEZ GARCIA aka "PAPI KRIS" is a Dominican national and drug trafficking associate of PERALTA works jointly with PERLATA in drug smuggling ventures from Dominican Republic to Puerto Rico. VALDEZ GARICA is also owner of a money exchange business, known as K&K Group S.R.L. where PERALTA launders money.

Kelvin Enrique HERNANDEZ FLAQUER aka COTTO is a Dominican national and a drug trafficking associate of PERALTA. HERNANDEZ FLAQUER is an exporter of narcotics to the United States, specifically Miami and Puerto Rico.

Jhonan Alexander MARTINEZ URENA a Dominican national, is tasked by PERALTA to oversee transportation of cocaine from Dominican Republic to the United States and Spain. MARTINEZ URENA handles the logistics including recruiting and managing transportation crews, stash houses, and narcotics off-loaders.

Pascual Rafael CORDERO MARTINEZ AKA EL CHINO is a Dominican national responsible for the distribution of cocaine and heroin in Dominican Republic and Europe. CORDERO MARTINEZ is currently incarcerated in Dominican Republic facing narcotics and money laundering charges. Even so, CORDERO MARTINEZ is still active in the narcotics trafficking business while in custody.

Huascar MEJIA GONZALEZ AKA WASCALITO AKA WASCAR is a Dominican national and facilitator of money laundering activities for the PERALTA TCO. On December 15, 2009 the Dominican National Police arrested MEJIA GONZALEZ and seized \$476, 880 United States Currency. At the time of arrest, MEJIA GONZALEZ was involved in laundering money for Jose Agosto FIGUEROA aka JUNIOR CAPSULA. FIGUEROA was arrested and plead guilty on drug trafficking charges in July 2010.

Boargnes SANCHEZ NOLASCO AKA W, AKA LA LETRA, is a Dominican national and a high-level actor of the PERALTA TCO. SANCHEZ-NOLASCO manages cocaine negotiations, distribution, and transactions with high-level foreign traffickers.

Antonio Juan FARIAS ARBELO AKA EL ESPAÑOL FARIAS ARBELO is a Dominican national who handles logistics of transporting multi-ton kilogram quantities of narcotics from Dominican Republic to Puerto Rico and to the United States, specifically Florida (FL) for the PERALTA TCO. FARIAS ARBELO has a degree in naval sciences. He consults with PERALTA and other members of the TCO on the best vessel to use to transport narcotics and where to hide the narcotics in vessel.

Vladimir Benito PAULINO GARCIA is a money transporter the PERALTA TCO. PAULINO GARCIA was caught on June 16, 2015 \$446,670 United States currency for the PERALTA TCO. Subsequently PAULINO GARCIA was arrested on July 28, 2016 in Dominican Republic for possession with intent to distribute 325 kilograms of cocaine. The cocaine belonged to PERALTA TCO.

Nathanael CASTRO CORDERO is a former member of the Dominican Armed Forces. He is a personal aid to PERALTA and also is responsible for security for PERALTA.

LUIS ANGEL PANA ANDROLAY AKA TOYO, AKA FERNANDO ANDRADE is a Venezuelan national and one of a few known brokers for Colombian suppliers of the PERALTA TCO.

Jorge GARCIA FERNANDEZ is a Colombian national and one of the links between Colombian suppliers and the PERALTA TCO. GARCIA FERNANDEZ has an open arrest warrant in the Eastern District of Virginia for Title 21, United States Code, Sections 959(a), 960(a)and 963 from April 14, 2017.

OCTAVIO EDUARDO DOTEI DIAZ OTEL DIAZ is a straw purchaser of property for

the PERALTA TCO. DOTEI DIAZ has purchased a Villa in Barracoa, DR for PERALTA with a down payment of \$100,000 USC. DOTEI DIAZ also has vehicles registered under his name that are used by other TCO members.

EDUARD MONTERO traffics kilograms of cocaine among other illegal activities for the PERALTA-ADAMEZ DTO. MONTERO was arrested by the Miami Dade Sheriff's Department in 2017 on money laundering charges.

MARGIORIS FERNANDEZ CUELLO AKA CHIQUITIN is a transporter of large quantities of cocaine and heroin for the PERALTA TCO. PERALTA has worked directly with FERNANDEZ CUELLO to transport both cocaine and heroin

MUSTAFA HAMOUND AKA PARCERO is the personal accountant of PERALTA. He has aides in the money laundering operations of the PERALTA TCO.

JOSE FERNANDO COSCULLUELA SUAREZ is a music producer and performing artists involved in money laundering and drug trafficking operating out of Puerto Rico. Through his businesses COSCULUELA launders money profits for the PERALTA TCO.

SALOMON EUSEBIO ROSARIO also known as AKA PIKI, a Dominican national, a drug trafficking associate of the PERALTA TCO. COSCULLUELA-SUAREZ traffics cocaine EUSEBIO ROSARIO through the Palmas del Mar Boat Marina in Humacao, PR.

#### **CONFIDENTIAL INFORMANT 1**

Confidential information (CS 1) has been a drug trafficking associate of PERALTA and has detail knowledge of PERALTA'S TCO. Beginning in about 2013, CS 1 became a facilitator of drug trafficking for the PERALTA TCO. CS 1 aided in the transportation of a least three (3) loads of cocaine from Dominican Republic to Puerto Rico in 2013. The amounts of cocaine each

load varied from approximately 60-100 kilograms. CS 1 is aware, through personal knowledge and reliable information received from members of the TCO, that throughout the length of the charged conspiracies, PERALTA and his organization have received large quantities of cocaine in the Dominican Republic for further distribution in the Caribbean (Puerto Rico and neighboring islands) and the Continental United States. CS 1 became aware that they were a subject of investigation after a series of arrest and a search warrant was executed. Thereafter, CS met with investigators in 2017 and has agreed to cooperate with FBI and DEA investigators. Through this cooperation, investigators have obtained a series of audio/video recordings of PERALTA conspiring with others to smuggle narcotics into Puerto Rico.

**CONFIDENTIAL INFORMANT 2**

Confidential informant (CS 2), was an associate of Peralta from approximately 2007-2009. CS 2 resided in both Dominican Republic and Puerto Rico during this time. On several occasions, CS 2 and PERALTA came to agreements on the shipment of cocaine and heroin from Dominican Republic to Puerto Rico. PERALTA would supply CS 2 with multiple kilograms narcotics to be transported. Part of the narcotics were payment for the transportation. Another part belonged to PERALTA and were to be sold in Puerto Rico. A third part of the load was for CS 2. The transportation of cocaine was done via fast boat.

CS 2's last transaction with PERALTA was in 2009 for cocaine. PERALTA and CS 2 came to an agreement where PERALTA would supply CS 2 with 100kg of cocaine. Of those 100kg, PERALTA agreed to provide FIGUEROA 50kg which FIGUEROA would pay for up front and approximately 50kg to FIGUEROA on credit. PERALTA also gave FIGUEROA another 50kg to transport on his behalf. All 150kg were transported from the Dominican

Republic to Puerto Rico by FIGUEROA and his associates per the agreement. After this transaction CS 2 discontinued working with PERALTA because CS 2 considered PERALTA untrustworthy business partner.

CS 2 is currently in Federal prison, having plead guilty on drug trafficking and money laundering charges.

**CONFIDENTIAL INFORMANT 3**

Confidential informant (CS 3) supplied the PERALTA TCO with cocaine from approximately 2009-2010. The quantities of transactions were between 25 and 40 kilograms for an approximate total of 150 kilograms over time. CS 3 last transaction with PERALTA was a 34 kilograms cocaine transaction towards the end of 2010.

PERALTA personally offered CS 3 the use of PERALTA's drug air routes from the Dominican Republic to New York.

CS 3 is currently in Federal prison, on violation of conditions of probation. He was arrested and plead guilty to drug trafficking charges in 2012.

**CONSENSUAL RECORDINGS**

Throughout the course of the investigation, CS 1 consensually recorded **PERALTA** on numerous occasions where narcotics trafficking ventures (both anticipated and past) were discussed. Below are transcriptions of some of the recordings. **PERALTA** is identified as CESAR in the transcribed portions below.

**CONSENSUAL RECORDINGS: March 29, 2017**

**CÉSAR EMILIO PERALTA ADAMEZ:** Look, I'm going to tell you something. Chiquitin owes me a million two hundred dollars. But I crowned with Chiquitin some six thousand pieces in Puerto Rico. Three hundred, two hundred, four hundred... Well, the smack I crowned a thousand and some. I was an airplane and we would get in--, we would get in the plane twenty of coke and eighty of smack. But that was the way we worked. Every week. Weekly. And the people, "Chiquitito". Sirs, I earned good money with Chiquitin. I have no malice. For example, this is Parcero. Parcero was my accountant for four years, the secretary. That is, look at how I worked with Parcero, that I know he must have told you.

**ANTONIO JUAN FARIAS ARBELO:** *No, no, I cannot say yes nor no.*

**Cesar EMILIO PERALTA ADAMEZ:** *Look.*

**ANTONIO:** *Because you don't take from nor leave to the man, you give him what belongs to him.*

**CÉSAR:** Look, look, how I worked with him. A shipment would arrive, "Oh, store it, Parcero". "Parcero, give him a hundred, two hundred to the other, three hundred to another, pick-up that money, pay that. Let's pay off first." We paid off. On the round back, I would stick with two hundred things and I would stick. "When do you want to come, Parcero?" "Give me thirty", "No, come in fifty". He would come to me with a list, we owe this, pay this, this is left. And he would leave for the mountains, and get into a truck when he came for that, he would store it, and deliver it. It went for three or four years. Parcero owes me a 'chichita'. I have no problem with the Parcero. He is the one in hiding for being dumb. Then, why does one need to

be the one who...? He said it once at a meeting where everyone was calling him a “scoundrel”, between Fernando, everyone. And he said, “Now I’m the bad guy, previously I was the good guy” -and it’s true, he would solve everything for us. Because there was a time when Fernando stopped working, and I continued working with other people and he kept working with me. I separated from Fernando.

**CONSENSUAL RECORDING: June 21, 2017**

**Antonio JUAN FARIAS ARBELO:** *Yes, excuse me.*

**CÉSAR:** *Sorry.*

**ANTONIO:** *If you don’t have that thing, you do--, you let me go by so I—I...*

(Overtalk)

**CÉSAR:** *But...*

**ANTONIO:** *I have to be--, get my head out.*

**CÉSAR:** *This is mine. Do you know how to do this? First, we coordinate the numbers and say the fishing boat is five miles from where your yacht will be behind. And we’ll let a dinghy go from the boat, that will go and take it to the yacht.*

**ANTONIO:** *Right, an inflatable.*

**CÉSAR:** *Yes, an inflatable. But do you know how they react? With money. That I can do in fifteen days, but with money.*

**ANTONIO:** *How’s that? That I have to take the money there?*

**Bernardo Antonio VALDEZ GARCIA:** *No, you have to put down money...*

(Overtalk)

**BERNARDO:** *Go out from Margarita...*

**CÉSAR:** *Say, well, look, the people down there will put down two hundred, I’ll put down two hundred, and you put down two hundred...*

CÉSAR:

*Like that, let's do it with six hundred  
Let's do it for six hundred between all of us.*

ANTONIO: *The minimum is five hundred.*

CÉSAR: *Ujum.*

BERNARDO: *Yes.*

ANTONIO: *That is, my space.*

CÉSAR: *Uhum.*

ANTONIO: *But I cannot go over nine hundred, because the space is limited.*

CÉSAR: *Tony, a Boricua, would do that for me. Two hundred, around that. But that's how it is, everyone has to invest, nobody is going to give in return of nothing.*

BERNARDO: *Twenty, twenty-one, like that.*

CÉSAR: *Twenty-three.*

ANTONIO: *I mean, yesterday, I got information there...*

CÉSAR: *No, that's not it.*

ANTONIO: *... with the Boricuas, and they told me how it was, a twenty is the fee.*

CÉSAR: *That's it, and even more if you...*

*(Overtalk)*

ANTONIO: *The equipment is mine.*

CÉSAR: *The people from Margarita have to dispatch a dinghy.*

ANTONIO: *Me? They have to dispatch the dinghy.*

CÉSAR: *Uhum.*

ANTONIO: *They let it go, and I go by and take it...*

CÉSAR: *Uh-uh... We send three boats. One is empty, the one that goes and gets close to you and asks you if everything is alright, "Yes", and then, they dispatch the dinghy. It gets close to you up to a mile, and it catches up to you, during the day. It tells you, "Yes, we already saw it" - at 9:00 at night, they go and transfer that in a dinghy.*

*ANTONIO: I like it there during the day.*

*CÉSAR: Well, they go during the day.*

*ANTONIO: So I can come in during the day. I want to go out...*

*CÉSAR: You enter during the day.*

*ANTONIO: I want to go out during the day and come back in during the day.*

*CÉSAR: But they must be there, they cannot miss the appointment.*

*ANTONIO: I cannot miss the appointment. The latest I'll wait for the appointment is one hour.*

*BERNARDO: Very hard to make it in one hour.*

*ANTONIO: No, no, because...*

*CÉSAR: They will take longer.*

*ANTONIO: No, because who need to be there are--, the ones running the 'bodilla' are them, I run for four hours to get to the place.*

*BERNARDO: That is, they have to be the one waiting for you.*

*ANTONIO: Yes.*

*BERNARDO: But the boat cannot stop, because if it's a...*

*ANTONIO: No, because they are going to be at the fishing spot. That's why I said 120, there is a fishing spot.*

*CÉSAR: That is nonsense, all that gets sorted out, Antonio. To do that--so you know--you have to send money there. Whatever you want. How do they understand? Look, we put down two hundred. And sit and wait, that's not a one month thing--, it's not a one week thing, that's a one month thing, two months, that everything is set and ready to go and 'pin'.*

*BERNARDO: The merchandise has to arrive at Margarita, which is very difficult.*

*CÉSAR: No, and even less with that strike.*

*BERNARDO: Margarita is very difficult; it's not the same as going out from...*

*CÉSAR: Or from Cumana.*

BERNARDO: *Cumana... or from Puerto...Puerto... Puerto La Cruz*

CÉSAR: *Puerto Rico... No, that takes up some organizing.*

ANTONIO: *Well, I have my parking and a vehicle there.*

CÉSAR: *Don't worry.*

ANTONIO: *Not one, I have two vehicles.*

CÉSAR: *And you invest on that?*

ANTONIO: *On what?*

CÉSAR: *Put in--Putting in your hundred?*

ANTONIO: *Oh, but of course. Remember that I have to give face. I already did the infrastructure, I have everything set up.*

CÉSAR: *That is if you say you are putting in a hundred...*

ANTONIO: *I have to give face wherever I go.*

CÉSAR: *Be careful with the friends.*

ANTONIO: *Oh, but if I had something to make myself feel good, I would never talk to anyone. That is, if I had...*

CÉSAR: *You have like a thousand dollars, four hundred, you buy a hundred with...*  
(Overtalk)

CÉSAR: *... lower the money and lower the...*

BERNARDO: *I'll put in a hundred, too.*

CÉSAR: *Look, BERNARDO, let me explain...*

ANTONIO: *I'm way past my time, maestro. I have to go to my crib.*

CÉSAR: *Tell her you are working.*

ANTONIO: *Luck is that it is not her.*

CÉSAR: *Oh, do you have a pen there, buddy? Leave that on time. That's just, buy it, order the*

*production, and wait for the new moon, that's a process. That's how I organized it, like here, that you get it today and you tell me, "Cesar I'm leaving on Saturday", it is not like that there, no.*

ANTONIO: *Remember that the moon has nothing to do with it, because these are fishing boats, and they don't go very fast.*

CÉSAR: *They get the merchandise through, they like it to be at night. Look, Antonio, look how this is done. Look, this is Puerto Rico, this is the Dominican Republic, here are the Lesser Antilles, and here is Aruba, Curacao...*

(Overtalk)

ANTONIO: *Curacao and Margarita.*

CÉSAR: *Here is Venezuela, and here is Cumana. Cumana is here.*

BERNARDO: *Cumaná.*

CÉSAR: *Here, look. When the fishing boats go out of here, what we did here, BERNARDO, we have to do like this, look, (whistle) and you go here. Look...*

CÉSAR: *This is 16 - 'flop' - in front of Puerto Rico, it goes over here. They come out this way, look, they come in twos. Through here it's 120 miles from Puerto Rico, that's the South of Puerto Rico, that happens to be the same South as here.*

BERNARDO: *This is part of Venezuela, those 120 miles.*

CÉSAR: *No, that is...*

BERNARDO: *Those are Venezuelan waters.*

CÉSAR: *No, no.*

((Overtalk))

BERNARDO: *Knows, there, where...*

ANTONIO: *Those are international waters...*

CÉSAR: *Las Aves are around here.*

CÉSAR: *Las Aves are here.*

ANTONIO: *Las Aves, Palomino, Tortuga...*

CÉSAR: *We board here, at Las Aves. Las Aves, here, close by, at 40 or 50. Here is Antigua, Barbados, Vaina, el Diablo, St. Thomas, St. Martin, all that shit around here. That small boat to come, goes out from there and fishes there, what do they do? We send one, two and three small boat. I have been doing that for years, Antonio, not just now. That small boat, you are leaving from here, from Mayagüez.*

ANTONIO: Uh-uh.

CÉSAR: *Where from? From San Juan?*

ANTONIO: *No, no, from this side, more to this side, close to Fajardo.*

CÉSAR: *Here is Fajardo. Here. Fajardo is here. There. Then, comes the small boat that's fishing here -their limit is here, at 80, they are going to steal those forty miles that go from here to here. What does the fishing boat do? It comes and gets close... But, do you know what was born there? There, in front of Puerto Rico in the South, the devil was born -there it was born. Look, six--, it could be, ah... sixteen with sixty eight, sixteen with sixty seven. Eighteen is here, in the Dominican Republic, 18, 19, are in there, 17, Dominican Republic.*

ANTONIO: *Maestro, now I can see you are very good in the water.*

CÉSAR: *No, I'm, I'm very good at that, I'm a Maestro at that. I'm--, I know the Caribbean by heart, because I studied navigation at home. It's not something somebody told me. I studied navigation at home, the coordinates I know off the top of my head. Then, they are going to steal 40 miles, that's the prohibited area, and he is going to get close to you...*

ANTONIO: *Those are national waters. They can fish 40 down, and they are in their territory.*

CÉSAR: *My boat will go and will see it first, relax, empty, with nothing. La Mosca, we call it.*

ANTONIO: *La Mosca is ahead.*

CÉSAR: Yes a fly ahead. And the one with the drugs is back here.

((overtalk))

ANTONIO: Maestro, that word, so vulgar?

CÉSAR: (Laughs)

ANTONIO: "The food", "The job"...

CÉSAR: That, we are going to do at sixteen with sixty-eight, in the south of Puerto Rico.

**SEIZURES RELATED TO PERALTA TCO**

On 8 November 2015, the Dominican National Police arrested 6 individuals and seized 53 kilograms of cocaine and 2 kilograms of heroin onboard luxury yacht "The Kingdom." Luxury yacht valued at \$20 million dollars. CS 1 affirms that a portion of the narcotics on this shipment was belonged to the PERALTA TCO. This ship was going from Dominican Republic to Miami when it was intercepted and searched by the Dominican National Police.

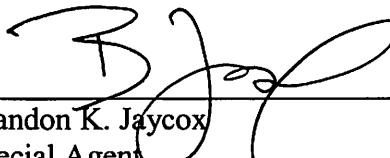
On May 23, 2008 Customs and Border Patrol (CBP) aircraft conducting routine patrol detected a 22-foot Hydra Sport vessel in the waters between Dominican Republic and Puerto Rico. CBP obtained United States Coast Guard (USCG) assistance in boarding the vessel. USCG personnel detected bags on the deck which field tested positive for cocaine. A thorough inventory search of the vessel revealed 687.2 kilograms of cocaine and 7.5 kilograms of heroin.

CS 2 affirms he provided logistics for this drug trafficking. The narcotics in boat belonged to the PERALTA TCO. The load was being transported from the Dominican Republic to Puerto Rico by persons hired by CS 2 at the direction of PERALTA.

**CONCLUSION**

Based on the aforementioned facts and evidence revealed through the investigation, the Affiant submits there exists sufficient probable cause to believe **CÉSAR EMILIO PERALTA ADAMEZ** has from in or about 2007 until in or about 2017, violated 21 USC §§ 952, 960, 963 (Conspiracy to Import Cocaine into the Customs Territory of the United States from a Place Outside Thereof).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

  
Brandon K. Jaycox  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and Sworn to before me this 20<sup>th</sup> day of November, 2018, in *San Juan, Puerto Rico*.

  
UNITED STATES MAGISTRATE JUDGE